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DISTRICT 24

September 29th, 2016

To Staff of the Arizona Department of Education (ADE)

Re: Comments on the Draft Arizona State Education Agency Consolidated State Plan for ESSA

As an elected official representing Legislative District 24, I submit the following comments regarding the draft Arizona State Education Agency Consolidated State Plan. As a local school board member it is great to see that the Every Student Succeeds Act (ESSA) offers states greater flexibility and local control over education policy. However, this flexibility comes with many opportunities, responsibilities and challenges for our state to develop pragmatic policies to ensure every student in our state receives a well-rounded education.

As the state gears up to implement the new federal law, please consider my following comments on specific subjects addressed in the initial ADE draft of the consolidated state plan for ESSA:

- **English Language Learner (ELL) Model** – The current Structured English Immersion model negatively impacts our students, and in some cases, it makes it very difficult for high school students to graduate in four years. I would like to know what ADE’s long-term goal is for ELL students in Arizona.
- **Educator Effectiveness/Teacher Certification** – ESSA eliminates the “highly qualified teacher” references and replaces them with a single requirement that Title 1 program teachers meet applicable state certification and licensure requirements. This shifts the responsibility to the state to ensure that low-income and minority students are not served at disproportionate rates by inexperienced, ineffective or out-of-field teachers. As we are experiencing a severe teacher shortage, providing more flexibility with teacher certification, could help tremendously. However, we need to find a balance and ensure that flexibility doesn’t result in decertification of the profession. Lastly, ESSA supports and funds different innovative strategies to prepare, train, recruit and retain teachers and school leaders in high-needs schools such as school leader recruitment and support grants. The state plan references the importance of certain practices to retain and recruit teachers but does not mention the cost associated with these practices. I am interested in learning how ADE plans on taking advantage of the new funding opportunities provided under ESSA.
- **State Assessments** – During the last legislative session, we passed HB 2544 requiring the Arizona State Board of Education (SBE) to adopt a menu of locally procured assessments from which schools can select one to administer to their students instead of using the statewide assessment (AzMERIT). The menu of assessments for high school students is effective on the 2017-2018 school year and for elementary students this would become effective for the 2018-2019 school year. The issue with this is that under ESSA, high schools are allowed to take a locally selected assessment as long as the assessment is

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nationally recognized and meets certain criteria; however the same flexibility does not apply to elementary schools. Thus if state statute remains the same, in SY 2018-2019, we will have state statute conflicting with federal law. It is my understanding that ADE will seek to be one of the seven states participating in the Innovative Assessment Pilot; however, what will happen if Arizona is not picked as one of the seven?

- **Accountability System** – I believe that as we move forward to implement a well-rounded education we need to continue to decrease the “weight” of assessment data and to increase the “weight “ of other areas that are vitally important such as dropout rates, graduation rates, and growth rates. Schools are complex, and if we continue to use only assessment data to measure schools, parents will not be getting the full picture of all schools. If the goal is to provide clarity and transparency for parents and the broader community about the true quality of schools, then state labels need to be based on multiple measures.

I truly appreciate ADE’s efforts in collaborating with key stakeholders, adequately collecting feedback and using such feedback to further improve the state plan.

Sincerely,

A handwritten signature in blue ink that reads "Lela Alston". The signature is written in a cursive style.

Lela Alston

State Representative, LD 24